



Recommendations for Implementing Community Choice Aggregation

To: City of Gahanna, Ohio

From: PCFO Technical Assistance Team

Date: May 9, 2024

Re: Recommendations for Implementing Community Choice Aggregation

Disclaimer: This does not constitute legal advice. PCFO recommends that you review this document with applicable legal counsel.

Key Recommendations for Gahanna:

- **Timing is Important:** Current market conditions are favorable for aggregation to effectively save residents money. Currently, Ohio communities utilizing electric aggregation in AEP Ohio territory are saving money relative to the standard supply offer through the distribution utility. PCFO recommends moving forward sooner to more quickly provide savings to residents by taking advantage of these market conditions.
- **Start Simple:** More complex program design can support key community goals in the long-run, but to ensure immediate success and buy-in, PCFO recommends keeping your program design simple or joining a Council of Governments in order to utilize their built-in program benefits.
- **Thoroughly Assess:** PCFO recommends asking any interested suppliers a series of in-depth questions and get their responses in writing. Gahanna should ask for clarity on everything they wanted included in the program and contract. PCFO can support Gahanna in ensuring you cover all key components of a program with the questions.
- **Go Renewable:** Aggregation is one of the most effective policy solutions to help you achieve your emission reduction goals. We have also seen communities implement 100% renewable energy programs while saving money for residents.

Community Choice Electric Aggregation: Context

Community choice electric aggregation leverages local purchasing power and decision-making to secure electricity from a specific source and at a specific price. Aggregation is a tool that has been available to Ohio municipalities since 1999, when Senate Bill 3 established Ohio's competitive retail market for electric power generation. The Public Utilities Commission of Ohio (PUCO), the state body that regulates investor-owned utilities, explains: *"The electric industry consists of three main components: generation, transmission and distribution. Senate Bill 3, passed by the Ohio General Assembly in 1999, allows Ohioans to choose the company that generates their electricity. This program is commonly referred to as electric choice."*

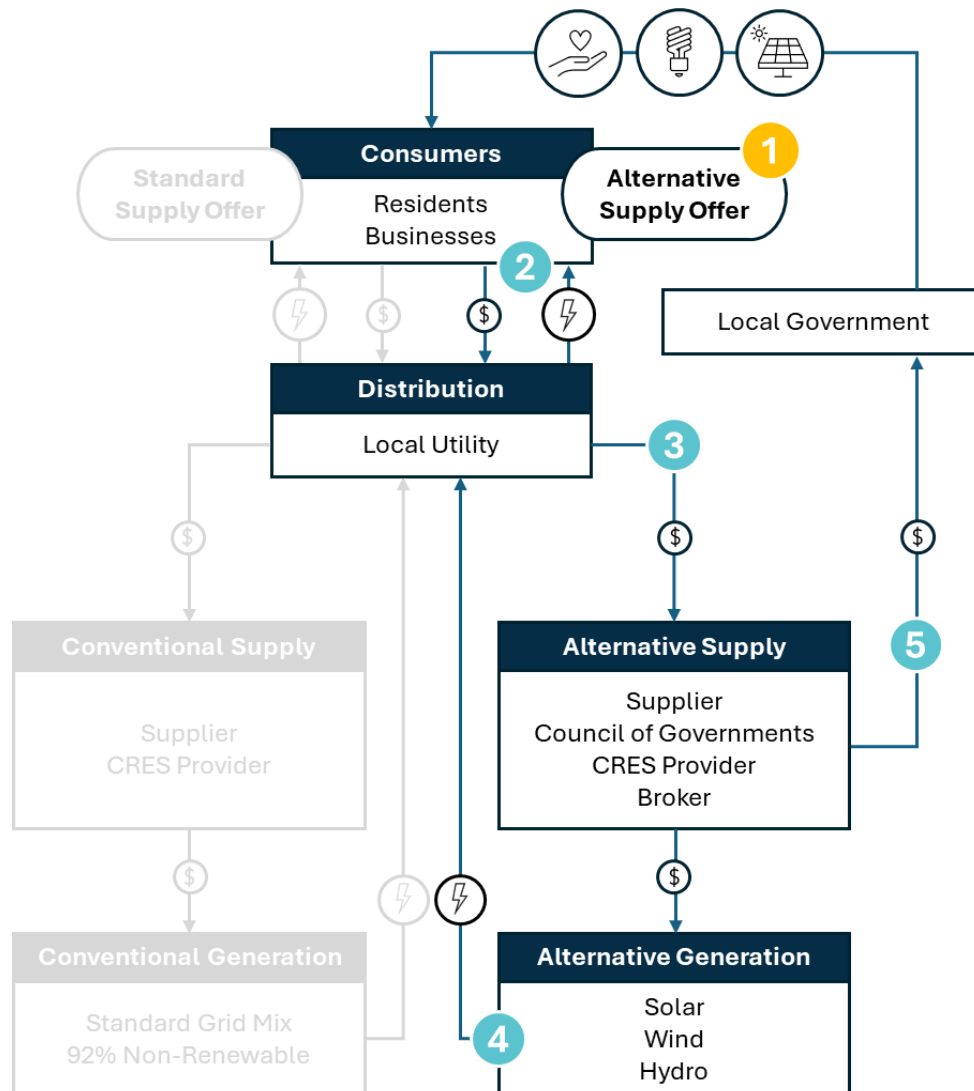
¹ <https://puco.ohio.gov/utilities/electricity/resources/electric-overview>

Ohio's municipalities can develop and deploy an electric aggregation program to leverage this electric choice on behalf of their residents and small businesses. Municipal aggregation programs are available to most residents and small businesses, with some exceptions – residents on PIPP plans and customers exceeding 700,000 kWh are excluded.

Community Choice Aggregation Flow Chart

- 1 A community chooses to aggregate and creates their ideal alternative supply offer.
- 2 For the customer, nothing changes. They still receive electricity ⚡ from the same utility and pay \$ the same bill.
- 3 The utility passes on some of that money to the supplier to pay for the actual electricity.
- 4 The generator is paid and sends electricity to the utility.
- 5 If it's part of the aggregation program, the city may receive funding to provide community programming such as:

-  Energy efficiency
-  Solar
-  Workforce development



Program Design

Whereas many aggregation programs focus first on cost savings, there are additional goals and benefits that a community can design into their programs. Although the importance of reducing energy bills for those struggling economically cannot be understated, the program components noted below can offer complimentary benefits that extend to the entire community. In addition to the environmental and financial benefits for households and businesses, nearly all of these components have an economic benefit for the community at-large.

These components are typically funded by including them in the supplier-cost of electricity or as an additional per-bill charge. In either approach, it is essential to be transparent about billing charges with consumers. It is possible to make some of these components optional, whereby a customer would opt-in to an additional fee. This may help to alleviate concerns of cost, especially for households with elevated energy burdens. However, an opt-in fee will see lower participation and is not recommended for all components.

Provisions for renewable energy sources, economic development, and resiliency

Aggregation offers one of the easiest ways to shift a community to emission- and pollution-free energy sources. Electricity produced by renewable resources offers economic, environmental, resilience, and physical health benefits. PCFO's Technical Assistance Team can help quantify these benefits.

Communities typically choose one of two ways to achieve the inclusion of 100% renewable electricity.

1. Require the chosen supplier to source electricity from newly developed, or additive, solar and wind facilities located in Ohio.
2. Require the supplier to offset electricity with renewable energy credits purchased from renewable facilities, typically located outside of Ohio.

The renewable energy industry is a growing field with a need to fill well-paying and stable career positions. As of 2021, Ohio has over 110,000 jobs in the clean energy sector, a 7% increase from the previous year. When including an in-state, additive renewable requirement for an aggregation program, cities can ensure these new jobs are filled by Ohioans.

To foster economic mobility for their residents, cities can include a workforce development component funded by the aggregation program. By intentionally designing programs to benefit underserved communities, local governments can aid in fostering a just transition to the clean energy economy. When considering the development of a workforce training program, staff should prioritize the inclusion of union jobs and community benefit agreements to maximize local workforce benefits. Consider the following case study from Columbus, OH:

Empowered! Job Training Program

The City of Columbus is allocating \$1.5 million to IMPACT Community Action to implement Empowered! – a new clean-energy jobs program geared toward Columbus residents ages 18-24. The program will provide training and on-the-job experience for careers in the clean-energy sector

and focus on recruiting participants from communities of color and women in Opportunity Neighborhoods.

Of the \$1.5 million being allocated for Empowered!, \$300,000 is from the city's Clean Energy Columbus program and its Clean Energy Workforce Development Fund, which is funded annually by the city and AEP Energy as part of the energy aggregation's supply agreement.

Link: <https://www.columbus.gov/Templates/Detail.aspx?id=2147524830>

Aggregation programs sometimes include a mechanism to fund further adoption of solar panels for residents and businesses. Approaches may include free site assessments, rebates, or low-cost loans. As with energy conservation measures, programs are sometimes designed with a specific audience in mind, such as municipal buildings or at-risk households. For example, consider this case study from Athens, OH:

Athens Public Solar Fund

The new SOPEC Electric Aggregation Program for the City of Athens, Ohio, now includes the Athens Carbon Fee — a fee that recognizes the heat-trapping carbon dioxide emissions from fossil fuel generation plants that provide power for Ohio's electric grid.

The 2/10 of a cent (ϕ) per kilowatt-hour (kWh) fee is added to the final supply rate for residential and small commercial electric utility (AEP Ohio) customers in the City of Athens, bringing the current City of Athens program rate to 9.857 ϕ /kWh — this rate is fixed until June 2025 and supplied by AEP Energy.

All revenues collected from the fee will be deposited into the Athens Public Solar Fund at OUCU Financial to be used for the future development of solar PV systems on public buildings and facilities within the City of Athens.

Link: <https://www.sopec-oh.gov/athens-public-solar-fund>

Key program design questions for municipalities ready to implement community choice aggregation:

- Does your city have policy goals that could be served by an aggregation program?
 - Reducing emissions or achieving 100% renewable energy
 - Supporting economic growth and job creation by purchasing electricity from Ohio-based generators
 - Creating a local energy efficiency, solar panel, or electric vehicle charging program
 - Securing a funding stream for equity and sustainability initiatives in your community

If your community is ready to create and implement an aggregation program, consider also the following key guiding questions:

- What are the community's present and future goals with electricity? How does this fit into the comprehensive plan, sustainability plan, or other endeavors the community has already established as priorities?
- Is there a city in Ohio whose aggregation program you would like to model yours after?
- What role do you envision playing in the aggregation process and program delivery? What resources do you have to support this role?
- Opt-out programs have greater participation. Is your city leadership on-board with the process?
- Which community sectors/members will be eligible in the program? Residential, commercial, and municipal accounts may qualify?
- Who are the key community members that need to be part of the process?
- What additional energy services are being sought (efficiency, on-site solar, community grants)?
- What percent of the electricity will be supplied by renewable energy? Is there a desire to purchase electricity from Ohio generation sources? Or are you okay with out-of-state renewable electricity?
- When do you envision the program commencing?

Community Choice Aggregation: People and Organizations

Aggregator or Government Aggregator

By Ohio law, the 'aggregator' is technically the legislative authority of a municipal corporation, the board of township trustees of a township, or a board of county commissioners of a county, that aggregates the residents and businesses of their community for the purpose of purchasing retail electric generation service on an aggregated basis. The aggregator may also develop community programs as part of the aggregation program, such as to provide energy efficiency services or onsite solar systems. In practice, aggregator is often used to refer to brokers, suppliers, or councils of governments that run aggregation programs for municipalities.

Broker or Aggregation Broker

An aggregation broker is sometimes hired by cities to help with developing and sometimes running their aggregation program. Although not necessary, they serve as subject matter experts to ensure the process runs smoothly.

Competitive Retail Electricity Service (CRES) Provider

A CRES provider is the retail electric service provider that competes for your business by offering alternative competitive prices, renewable energy options or other services and incentives. One of these services may be filing your paperwork with the PUCO, securing the right supplier, or managing the aggregation program. All CRES providers are required to be certified by the PUCO.

Council of Governments

Councils of Governments (COGs) can be helpful partners for communities considering Community Choice Aggregation and may serve as the CRES provider for aggregation. COGs bring together local governments to collaborate on CCA, offering expertise, stronger negotiating power, and streamlined processes.

Is a Council of Governments right for your city?

Many communities in Ohio choose to pursue aggregation programs through a COG.

Similar to seeking aggregation services from broker/supplier, a municipality may choose to join a council of governments (COG) in order to aggregate. COGs are regional bodies that bring together multiple municipalities and counties to collaborate on issues of common interest. Here's how COGs can be especially valuable to CCA programs:

Collaboration and Expertise: Deciding to implement CCA requires research, planning, and navigating legalities. A COG can provide a platform for member communities to share knowledge, resources, and technical expertise. This collaboration can be especially helpful for smaller communities that might not have the staff or budget to tackle CCA on their own.

Joint Negotiations: A COG's combined buying power of all its member communities can be significant. By negotiating with electricity suppliers as a larger block, the COG can potentially secure better rates for member communities compared to what they might get individually.

Standardization and Efficiency: A COG can help develop standardized program elements for member communities, such as enrollment procedures and customer service protocols. This streamlines the process for residents and reduces administrative burdens for individual municipalities.

Regional Advocacy: COGs can lobby state legislatures and regulatory bodies to promote policies that support CCA programs. This advocacy can be more effective on a regional level than individual communities acting alone.

However, there are also some considerations:

Member communities within a COG may have different priorities regarding electricity rates, renewable energy goals, or program structures. Finding a CCA program that works for everyone can be challenging.

Overall, COGs can play a valuable role in facilitating and supporting CCA programs for their member communities. By leveraging collective resources, expertise, and buying power, COGs can help communities achieve their energy goals.

Ohio has three COGs which serve this purpose: Sustainable Ohio Public Energy Council (SOPEC), Northeast Ohio Public Energy Council (NOPEC), and the Miami Valley Communications Council (MVCC).²

Whereas COGs can bring the strength of a regional approach to aggregation, each offers different services as part of their programs. A municipality would choose to join a COG, rather than working directly with an individual supplier if their goals can be met by the COG. If a municipality wants a highly tailored program for their community, it may be best to seek the services of a specific supplier.

² MVCC is limited to the Miami Valley Region.

Distributor or Distribution Utility

An electricity distributor is the company that delivers your electricity to you. This is who we commonly think of as our utility. The distributor maintains our local power lines, responds to outages, and sends our bill every month. See “Investor Owned Utility” below.

Investor Owned Utility

Investor-Owned Utilities (IOU) are regulated by the Public Utilities Commission of Ohio (PUCO). The majority of Ohioans live within IOU territory, or the area that an IOU serves. Any municipality served by an IOU may aggregate if they choose to. Currently, aggregation is not available for municipal utility or rural co-operative customers.

Supplier

A supplier is the company that you can choose to procure and supply the actual electricity that your community will consume. As part of aggregation, the supplier will first and foremost be responsible for providing electricity. They may also play a role in designing and implementing the program.

RFP/RFQ Considerations

Municipalities can ask key questions of suppliers and aggregators during the Request for Proposals (RFP) or Request for Qualifications (RFQ) process based on their community’s goals. PCFO can provide technical assistance with RFP design. If you prefer to issue an RFQ, we would advise incorporating the questions shared in this memo, along with reviewing the example from Upper Arlington (Attachment A) to ensure you have covered all topics. PCFO can provide assistance in drafting, review, and editing your RFQ and/or included questions for respondents.

Aggregation Providers

In developing information for this document and PCFO’s soon-to-be-released Community Choice Aggregation Toolkit, we reached out to multiple COGs, brokers, and suppliers and offered them an opportunity for feedback. We have incorporated feedback of those that participated. This list is included below and may be a helpful starting point if you choose to contact additional service providers for your aggregation program.

- AEP Energy
- Aspen Energy
- Dynegy
- Energy Alliances
- Northeast Ohio Public Energy Council
- Scioto Energy
- Sustainable Ohio Public Energy Council

If you would like contacts for any of these entities, PCFO can provide them to you.

Request for Information (RFI) – Energy Aggregation Program

The City of Upper Arlington is seeking information on Energy Aggregation Programs to provide community choice electric aggregation program services for the City of Upper Arlington. The City’s electorate voted on November 7, 2000 to authorize the City to have authority to act as an aggregator on behalf of the AEP company customers within the City in the year 2001 and thereafter. The City will need to pursue re-certification by the Public Utilities Commission of Ohio (PUCO) as a government aggregator.

The City is seeking to implement a program in the near future for a period of between twenty-four (24) and thirty-six (36) months. The primary goals of the City’s electric aggregation program are to provide stable electricity costs for residents and business customers, ensure selected provider provides reliable and first-rate customer service, and support renewable energy with a brown energy option for customers.

In an effort to explore options, the City is requesting additional information on your program. Please respond by Friday, May 19th, 2023.

Requested Information	NOPEC, Northeast Ohio Public Energy Council	SOPEC, Sustainable Ohio Public Energy Council
1 Does membership require participation in an aggregation program?	Yes. Each community seeking membership in the NOPEC gas or electric program would first need to have voted in community aggregation via a ballot measure in a primary or general election.	No. For example, the City of Dayton joined SOPEC in May of 2021 and did not lock pricing for its electric aggregation program until February of 2022. The Dayton electric aggregation program then did not become active until June 1, 2022. SOPEC also has various other programs that members can participate in.
2 Is there any charge to community’s to become a member?	No, there are no charges or fees for communities to become a member of NOPEC.	No. SOPEC does not have member dues.
3 How many communities are in your program?	NOPEC is comprised of 241 communities in 20 Ohio counties, the newest addition being Reynoldsburg, Ohio, who joined NOPEC for both electric and natural gas in May, 2023.	SOPEC currently has 27 member communities/public subdivisions (with that number projected to grow to 28 by the first week of June, with the City of Cleveland having just selected SOPEC as its 2023 electricity aggregation vendor for eligible FirstEnergy customers. However, it still needs to go through the City Council process and necessary hearings before it is official.) across over 30 counties in Ohio. SOPEC’s newest member is Upper Arlington’s neighbor, the Village of Marble Cliff.
4 Is every community offered a seat on your Board?	NOPEC is a Council of Governments governed by a General Assembly made up of one voting representative from each member community. This group elects a county/regional representative to the NOPEC Board of Directors. Each member community is encouraged to participate in the annual meeting and is able to vote on organization business. GA members vote on the rules under which we agree to operate as a COG, the representative from their region that sits on the NOPEC Board of Directors, and the annual NOPEC operating budget.	Every member of SOPEC has a seat on SOPEC’s General Assembly. The SOPEC Board of Directors is made up of the 5 largest communities, 5 regions of Ohio, and up to 5 at large representatives. There is currently no Central Ohio region representative on the SOPEC Board of Directors. Upper Arlington would also be one of the 5 largest communities in SOPEC. As such, per SOPEC Bylaws, there would be a Board seat available for Upper Arlington should the community want one.
5 Do you offer energy aggregation for both gas and electric?	Yes, NOPEC offers aggregation programs for both natural gas and electric.	Yes
6 Are communities required to use your Operations and Governance Plan? If not, do you offer assistance to update a communities plan?	When a community completes the process to join NOPEC, the NOPEC plan of operation and governance (POG) is in effect, and NOPEC serves the community under its certificate. If desired, NOPEC and its counsel, at NOPEC’s expense, will work to help the community maintain its own certificate. However, to avoid customer confusion, the NOPEC POG will apply as long as NOPEC is serving the aggregation, and the community’s POG will be in effect when NOPEC no longer serves the community	The short answer is yes, a community is required to use the SOPEC Plan of Operation and Governance. SOPEC recently sought clarification on this exact issue from the PUCO. First, if a community wanted to join the SOPEC aggregation and still maintain its own certification, it could. The PUCO would require the community to file a letter in its current docket to state that it has joined SOPEC and that all opt-out notices will be filed in the SOPEC case. Also, any changes to the Plan of Operation and Governance of the community would need to be updated in the docket and noticed to customers as required by rule. The PUCO does not permit a community to have a separate certificate under the SOPEC name. One certificate per aggregation (whether it’s the aggregation is electric or gas). For example, the SOPEC electric aggregation cannot have one certificate for one community and one certificate for everyone else. However, SOPEC can negotiate a different rate with a particular community for the opt-out program.
7 Is your pricing fixed or variable and how does it change?	NOPEC’s Standard Program Price is the default product for the majority of our member communities. The Program Price is a market-based rate that varies based on wholesale market conditions, electricity supply sources, competitor’s prices, and applicable industry charges. In addition, NOPEC offers several options for individual customers wishing to opt-in to different rates including: NOPEC’s Standard Program Price + 100% Renewable Content; a Monthly Variable Rate Option wherein customers can elect to receive a rate 4% to 6% less than the utility Price to Compare (PTC); and NOPEC’s 12 & 24 Month Fixed Term Options. NOPEC member customers have more product choices than are offered by any other aggregator in Ohio and have the flexibility to change their rate plan anytime without penalties or fees.	SOPEC pricing is fixed. SOPEC works with its communities to lock in competitive fixed-term pricing, for 1 to 3 years. Price stability is of primary concern to SOPEC. SOPEC understands that its communities should not be subject to unexpected price increases, which is why SOPEC does not utilize variable pricing. To ensure competitiveness, SOPEC pays special attention to the local utility auctions, SOPEC also closely watches energy markets on a daily basis and receives daily pricing information from AEP Energy. This information gives SOPEC the ability to provide weekly or daily analysis to SOPEC communities regarding the smartest time to lock pricing. It also allows SOPEC to be nimble and responsive to a fast-moving energy market that is based on a commodity. SOPEC has full transparency from AEP Energy on price components. Additionally, SOPEC has created a 501(c)(4) nonprofit organization named Sustainable Power Alliance, Inc. which is designed to build out local renewable energy generation assets to help supply SOPEC members. SOPEC is currently the sole member of Sustainable Power Alliance, Inc. For example, Sustainable Power Alliance, Inc. has an exclusivity agreement on an approximately 50 MW utility scale solar project in Southwest Ohio and is currently in the due diligence phase. SPA is also actively investigating development of solar on brownfields, and in discussions on multiple projects. Adding in those local renewable energy generation assets in the future will also help to ensure further stable and lower prices for SOPEC’s members.
8 What is the average cost per kw/H your communities are securing for 100% renewable electric in 2023?	NOPEC’s 100% Renewable Content electric product is backed by Green-E certified Renewable Energy Credits (RECs) and includes the additionality of EarthEra® (RECs) for the full amount of electricity used by residents and small businesses enrolled in this product. This program guarantees carbon reduction additionality by assuring that a portion of the supply charges paid by NOPEC customers are used to build new renewable energy utility-scaled projects. Our 100% Renewable Content Standard Program Price is set at 6.875 cents/kWh for June thru November 2023.	Current active 2023 SOPEC member communities’ electric aggregation programs: Average is 6.548 cents per kWh (all of SOPEC’s member communities’ electric aggregation programs feature 100% renewable energy) This average cost was determined by adding together the Dayton rate (AES Ohio territory) and Southeast Ohio communities rate (AEP Ohio territory) together, and dividing by 2. The City of Athens’ carbon fee was not factored into the average cost since that is a separate fee that the voters of Athens self-imposed via the ballot.
9 What is the average cost per kw/H your communities are securing for brown energy electric in 2023?	NOPEC’s Standard Program Price, which meets Ohio’s minimum RPS standards, is set at 6.45 cents/kWh for June thru November 2023.	All of SOPEC’s member communities’ electric aggregation programs feature 100% renewable energy. However, SOPEC has provided a step down brown energy electric option for all of its communities’ programs. A customer may simply call the SOPEC-dedicated AEP Energy number and request that they receive the step down brown energy option. This step down brown energy rate strips out the renewable energy certificates (RECs). Current active 2023 SOPEC member communities’ electric aggregation programs: Average of the step down brown energy option is 6.329 cents per kWh. This average cost was determined by removing the renewable energy certificates (RECs), adding together the Dayton rate (AES Ohio territory) and Southeast Ohio communities rate (AEP Ohio territory) together, and dividing by 2.
10 Do you offer protection to communities regarding program cancellations or communities wanting to terminate their program?	NOPEC currently retains \$50M in assets. These holdings provide sizable financial security from our supplier in order to secure contract performance by the supplier. The terms and conditions for communities to exit the NOPEC aggregation are transparent and clearly outlined in our Plan of Governance.	As noted above, price stability is of primary concern to SOPEC. SOPEC understands that its communities should not be subject to unexpected price increases, which is why SOPEC does not utilize variable pricing. SOPEC works with its communities to lock in competitive fixed-term pricing, for 1 to 3 years. SOPEC and its supplier AEP Energy have never terminated, canceled, or suspended an aggregation program prior to completion of engagement or expiration of full term.

11	Who is your electric supplier?	NOPEC's natural gas and electric supplier is NextEra Energy Services Ohio, LLC (NESO). NESO's parent company, NextEra Energy, Inc. is a financially strong, leading clean-energy Fortune 200 company continuously recognized for commitment to corporate responsibility and operational excellence. NextEra Energy, Inc. is currently the largest integrated utility company in the world by market capitalization, and is rated A-, A-, and Baa1 by Fitch, S&P, and Moody's.	AEP Energy has been the exclusive electric supplier to SOPEC since 2015. The SOPEC and AEP Energy relationship is built around trust and transparency. With over 250 dedicated energy professionals employed by AEP Energy, approximately 50 of them support SOPEC CCA programs in some fashion. SOPEC and AEP Energy have a Government Aggregation Master Retail Electric Supply Agreement. New SOPEC member communities can participate in an amendment process to the SOPEC/AEP Energy contract. Beginning in January of 2023, SOPEC became AEP Energy's exclusive selected governmental electric aggregator in Ohio for new communities seeking aggregation.
12	What sources are used to produce electric from your supplier?	Supply for our non-renewable electric products mirrors the generation resource mix for American Electric Power in Central Ohio. Projected Generation Resource Mix Data for the 2023 calendar year is based on a comparison between the sources of generation used to produce this product and the historic regional average supply mix: 38.5% natural gas, 33.0% nuclear, 22.0% coal with the balance coming from renewable generation sources.	The base power purchased on the open market by AEP Energy for SOPEC comes from various sources. However, all SOPEC communities also utilize what are called Renewable energy certificates (or credit) ("RECs") to obtain electric aggregation programs 10 of 17 City of Upper Arlington RFI Sustainable Ohio Public Energy Council featuring 100% renewable energy. SOPEC views RECs as a bridge to building out local renewable generation. RECs are a market-based instrument representing property rights to environmental and social attributes of generated renewable electricity. A REC legally conveys environmental & social attributes of 1 megawatt-hour (MWh) of electricity generated from renewable energy source (e.g., solar, wind, hydro). One purchaser owns exclusive rights to claim all renewable generation attributes of that REC. Electricity from many different sources mixes together in the power grid, so there is no way to distinguish exactly where physical electricity came from or how it was generated. RECs allow for accounting, tracking and assigning ownership to renewable electricity generation and use. Each REC is uniquely identified and includes data about where, when and how it was generated. 19 communities supplied by SOPEC utilize what are known as Green-e® RECs, which are the gold standard RECs and predominantly are made up of Midwest wind. The City of Dayton currently utilizes RECs from hydropower (dam in Montana built in 1938, 2019 vintage RECs, SOPEC and AEP Energy investigated to ensure no environmental or fishery concerns). SOPEC only utilizes wind, solar, and hydropower for its RECS.
13	Does pricing from your source depend on how much electricity is used and when?	One of the factors used to determine pricing is load size and shape. As stated in the answer to Question 7 above, other determining factors include wholesale market conditions, electricity supply sources, competitor's prices, and applicable industry charges.	No
14	What are your sustainability goals?	At NOPEC, we have been on a sustainability journey for nearly 20 years, developing and supporting programs and initiatives that advance the sustainability efforts of our member communities. These efforts include investing \$49 million in community energy-efficiency grants, retiring approximately 11 million renewable energy credits (RECs) and contributing over \$71 million into the EarthEra Trust through our energy provider NextEra Energy. In addition to providing 100% GREEN-E certified RECs, NOPEC seeks to support our member communities' interest to transition from RECs based structure to "physical renewables" based structure over-time, consistent with NOPEC's goals. NOPEC is actively engaged in seeking renewable energy development opportunities to transition to a greater percentage of renewable energy, including expansion of renewable energy sources in Ohio. NOPEC has a goal to procure 30% of its baseload from renewable energy sources located in Ohio by 2030.	SOPEC's mission is to provide simple, valuable, and reliable public energy programs that help our communities achieve their local energy and sustainability goals. SOPEC is committed to tailoring each new community's program to fit that community's desires and unique needs. SOPEC specializes in creative and innovative approaches to meet the sustainability goals of its communities,, as illustrated by the features of the cities of Athens and Dayton electric aggregation programs. For example, SOPEC was deeply involved in the establishment of the carbon fee to the City of Athens' opt-out governmental aggregation program rate and the city's local government accounts. The fee was established through public deliberations, including a ballot issue, and will fund public solar on city-owned facilities, helping Athens reach its renewable energy goals outlined in the Athens Sustainability Action Plan. SOPEC is the custodian of the resulting solar fund.
15	Do you offer sustainability incentives or educational programs for community member residents?	Beyond investments in renewable energy generation, NOPEC proactively supports renewable energy policies and consumer protection to support advancement of renewable energy capacity across the state. NOPEC also supports energy efficiency and renewable energy education for customers and member communities through in-person and digital Community Outreach initiatives.	Yes, SOPEC offers a wide range of sustainability incentives and educational programs for SOPEC communities and their residents. SOPEC is one of the first aggregators in Ohio to allow net metering in all of its electric aggregation programs. SOPEC negotiated on-bill repayment as a feature of its electric aggregation programs as part of SOPEC's most recent amendment to its AEP Energy Government Aggregation Master Retail Electric Supply Agreement. SOPEC has assisted member communities to become EPA Green Power Partnership communities. SOPEC communities currently make up 19 of the 20 Green Power Partnership communities within Ohio, with Cleveland being number 20. These 19 communities supplied by SOPEC utilize Green-e® renewable energy certificates (RECs).
16	What is your call center volume, wait times, and dropped call rates?	The NOPEC Customer Care Center staffing includes a dedicated core team of over 20 FTE call center agents, a Team Supervisor, and NOPEC Customer Service Program Manager who are experienced with all NOPEC gas and electric program specifics and equipped to handle any questions a customer may have regarding any aspect of the program. Agents are available to answer calls 24/7/365. The call center averages about 4,800 calls per month with average wait times under 1 minute and a .002% abandon rate. This team also maintains a very high level of Customer Service with an average quality score of 98% YTD. The NOPEC program call center utilizes a translation service and can support multiple languages.	AEP Energy, SOPEC's supplier, also provides a dedicated customer service and enrollment phone number for SOPEC customers at: 1-877-648-1937, Monday through Friday, 8:00 am – 7:00 pm and Saturday 9:00 am – 1:00 pm. These AEP Energy customer service representatives are located in Columbus, Ohio. SOPEC already receives regular reports from the AEP Energy Call Center on a weekly basis. SOPEC staff members are also available to program customers to answer their questions or concerns. SOPEC also has a native Spanish speaker on staff for assistance. SOPEC's website is also multilingual. AEP Energy's Ohio-based customer service program will support Upper Arlington's electric aggregation program with over 40 full-time, company employed, Customer Care Advocates, 4 supervisory staff, and 2 quality monitoring positions. AEP Energy is forecasting about 77,000 opt-out mailers for the City's electric aggregation program, which will result in about 7,000-8,000 calls generated from the letter. AEP Energy recommends staggering the mailings to allow for a better customer experience. Throughout the contract period, the AEP Energy call center will explain the program in detail to all new potential customers that call. AEP Energy's customer-service program received 121,000 calls last year. AEP Energy's customer service program answered 83% of the calls within 30 seconds and resolved 89% of them on the first call. Post-call customer survey satisfaction scores ("CSAT") were extremely high, averaging 4.70 overall and 4.88 for enrollment experience. Average wait times for the call center are under 30 seconds and average abandonment rates (e.g., dropped call rate) are less than 2%.
17	Do you have any active complaints with the PUCO on your program? If so, how many and are there any resolutions?	NOPEC currently has 2 pending customer complaints at the PUCO out of the nearly 1,000,000 customers we have served at some point over the past 12 months.	No
18	Will resident energy bills show that the City is a member of your program? Will residents see an additional charge from your program on their monthly bill?	NOPEC does not charge its residential or small business customers any additional fees. Customers will see NextEra Energy Services Ohio LLC listed on the supply portion of their bill and any charges from NOPEC-NextEra Energy Services will only be for the energy the customer used during that billing period.	Electric aggregation customers are billed the same way they are billed when they are on their local utility's standard service offer, with the exception that the supply charges on their bill are specific to the electric aggregation program's rate and their bill will indicate that their supplier is AEP Energy. There will not be an additional charge broken out on the monthly bill.
19	Are there any deposit requirements for programs your communities have used?	No. NOPEC provides a complete turnkey aggregation service with no additional charges or costs associated with membership. The cost of all program services and administrative costs are included in the standard electric pricing. No NOPEC member community has ever paid a single penny for the services and programming provided by NOPEC.	No